

MARTIN R. BADER (*Pro hac vice*)
mbader@sheppardmullin.com
JESSE A. SALEN (*Pro hac vice*)
jsalen@sheppardmullin.com
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
12275 El Camino Real, Suite 100
San Diego, California 92130-4092
Telephone: 858.720.8900

PATRICK McGILL (*Pro hac vice*)
patrick@mcgillco.com
MCGILL & CO., P.C.
5580 La Jolla Blvd, Suite 39
La Jolla, CA 92037
Tel: (619) 974-8886

Nathan D. Thomas (USB #11965)
Elizabeth M. Butler (USB #13658)
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: (801) 532-1234
nthomas@parsonsbehle.com
lbutler@parsonsbehle.com

Attorneys for Defendant BlendJet Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

BLENDTEC INC., a Utah corporation,
Plaintiff,
vs.

BLENDJET INC., a Delaware corporation,
Defendant.

**BLENDJET'S MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

Civil No. 2:21-cv-00668-TC-DBP
Judge Tena Campbell
Magistrate Judge Dustin B. Pead

Defendant BlendJet, Inc., pursuant to DUCivR 5-3 and the Standard Protective Order that applies in all civil cases in the U.S. District Court for the District of Utah, hereby moves this Court for leave to file under seal unredacted versions of the following documents:

- Corrected Declaration of Patrick McGill in Support of BlendJet's Response to Blendtec's Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys' Fees ("McGill Declaration");
- Corrected Declaration of Ryan Pamplin in Support of BlendJet's Response to Blendtec's Motion to Enforce the Protective Order, to Disqualify Patrick McGill and Sheppard Mullin, and for Attorneys' Fees;

Good cause exists to file these documents under seal because they have been designated as CONFIDENTIAL INFORMATION—ATTORNEYS' EYES ONLY pursuant to the Standard Protective Order by BlendJet and therefore contain non-public and sensitive information that, if publicly disclosed, could cause the designating party competitive harm. *See* DUCivR 26-2; DUCivR 5-3(b)(2)(C)(i)].

Accordingly, BlendJet respectfully requests that the Court enter an Order restricting public access to and/or sealing the foregoing documents.

Respectfully submitted this 2nd day of June, 2023.

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

/s/ Martin R. Bader
Martin R. Bader (*Pro hac vice*)
Jesse A. Salen (*Pro hac vice*)

MCGILL & CO., P.C.
Patrick McGill (*pro hac vice*)

PARSONS BEHLE & LATIMER

Nathan D. Thomas (USB #11965)

Elizabeth M. Butler (USB #13658)

Attorneys for Defendant BlendJet, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of June, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send an electronic notification to counsel of record for all parties, including the following:

Brett Foster (#6089)
Grant Foster (#7202)
Tamara Kapaloski (#13471)
DORSEY & WHITNEY LLP
111 S. Main Street, Suite 2100
Salt Lake City, UT 84111
Telephone: (801) 933-7360
Facsimile: (801) 933-7373
foster.brett@dorsey.com
foster.grant@dorsey.com
kapaloski.tammy@dorsey.com

/s/ Martin R. Bader